

Global FR 7974 – New Article 231

The members of the Sustainable Energy Action Committee (SEAC) include designers, installers, inspectors and certifiers among other stakeholders. The collective membership includes individuals, groups and jurisdictions that have been integral to the installation of the 2 million rooftop PV systems nationwide and over one million in the State of California. The members of SEAC disagree with Public Input 4318 and the resulting First Revision 7974:

From PI 4318 – *This global input is written to address a very serious safety issue that exists abundantly in the NEC.*

The problem here is that 90.3 provides committees dealing with alternative energy sources the ability to completely ignore 230.82(6).

From FR 7974 - *This First Revision is developed to address issues that have existed for multiple NEC cycles with respect to alternative energy systems and how they connect and interface with service equipment.*

All systems connected to the supply-side of the main disconnect have been inspected and approved in accordance with the applicable requirements of both Articles 230 and 705. The majority of the supply-side connections were facilitated through a bus tap ahead of the main disconnect within the existing service equipment. Where the service equipment did not include a provision by the manufacturer for the tap connection, an evaluation by a qualified Field Evaluation Body was required to maintain the equipment certification. The additional conductor protection provided by current-limiters was provided where required by Article 705 (tap conductors in excess of 10' per the 2020 NEC).

The claim that the interconnected systems installed and approved under the current and past NEC Articles 230 and 705 represent a “serious safety issue” is without merit. No documentation of injury or property damage that was a result of the current and past NEC requirements has been provided.

Neither the submitter of PI 4318 nor CMP 10 identified a specific serious safety issue that can only be addressed through creation of a new article. SEAC disagrees with the PI submitter that the code arrangement hierarchy of 90.3 is a “problem”. It is also inaccurate to suggest that CMP 4 ignores 230.82(6). NEC 705.11 (2020) specifically references 230.82(6) for supply-side connected systems.

Simply copying the language from the existing Articles 230 and 705 into a new NEC article does not aid in the practical safeguarding of persons and property from electrical hazards. Nor does it remedy any perceived issues of safety in the existing language of those articles. Safety concerns that exist in either Article 230 or Article 705 must be addressed through the proper NFPA process; a public input that identifies a specific technical safety problem with language that addresses the problem.